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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 21-11511(VFP)
JOHN DASILVA)	
)	Chapter 13
)	
)	Hearing date: 4-15-21
)	
)	<u>OBJECTION TO CONFIRMATION</u>
)	

Ford Credit Motor Credit Company LLC, a secured creditor of the debtor objects to the debtor's plan for the following reasons:

a. PLAN REFERS TO BOTH FORD CREDIT AND LINCOLN AUTOMOTIVE

FINANCIAL: Ford Credit holds a first purchase money security interest encumbering 2019 FORD FUSION owned by the debtor. The plan is confusing. It states the Lincoln Automotive Financial/Ford Motor Credit is unaffected by the plan. The debtor's loan is with Ford Credit and the plan should simply state that Ford Credit is unaffected by the plan. If the debtor has a separate loan with Lincoln Automotive the plan should state that as a separate entry.

- b. **Proof of insurance:** Ford Credit requests that the debtor provide it with proof that the vehicle is insured as required by 11 U.S.C. 1326(a)(4).
- c. **Lien retention:** The term of the loan exceeds the length of the plan. The plan should provide that Ford Credit will retain its lien on the vehicle until it has been paid in full by the debtor in accordance with the terms of the retail installment contract encumbering the vehicle and if the case completes before the loan is paid in full, the loan will not be discharged.

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney for
Ford Motor Credit Company LLC

Dated: 3-15-21